

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

CONTINQUE WILLCOT,

Plaintiff,

v.

SECURITIES AND EXCHANGE
COMMISSION, et al.

Defendants.

CASE NO. 24-cv-00317-DC-RCG

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A REPLY

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Securities and Exchange Commission (“SEC” or “Commission”) requests a seven-day extension of time to and including August 11, 2025¹ to file a reply in support of its motion to dismiss the Second Amended Complaint (“Reply”).

In support of this motion, the Commission states as follows:

1. This motion is the Commission’s first request for an extension of time with respect to this time limitation.
2. Counsel for the Commission has conferred with *pro se* Plaintiff, and he stated that he did not oppose the requested extension of the deadline to file the Commission’s Reply.
3. The Commission requests the additional time because of pre-planned vacations for Commission counsel and other work responsibilities.

¹ Plaintiff filed his opposition to the Commission’s motion to dismiss on Saturday, July 26, 2025. ECF 103. Therefore, the Commission’s Reply would be due August 4, 2025 absent an extension.

4. The Court previously granted Plaintiff's request for a 30-day extension to file his opposition to the Commission's motion to dismiss. ECF 99 (the motion seeking an extension).

WHEREFORE, the Commission respectfully moves for an extension of time from August 4, 2025, to and including August 11, 2025, to move to file a reply in support of its motion to dismiss the Second Amended Complaint.

Respectfully Submitted,

Date: July 28, 2025

/s/ Eric A. Reicher_____

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of July, 2025, I filed or caused to be filed the foregoing through the CM/ECF system which will provide service to counsels of record and I will provide a copy to Plaintiff if he does not receive notice through the CM/ECF system.

/s/ Eric A. Reicher

Eric A. Reicher

Special Trial Counsel

U.S. Securities and Exchange Commission